

# EXHIBIT “B”

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF	)	
CLIFF MANOR, INC., INTEGRATED	)	
HEALTH SERVICES AT RIVERBEND,	)	Civil Action No. 04-910
INTEGRATED HEALTH SERVICES AT	)	
SOMERSET VALLEY, INC., ALPINE	)	
MANOR, INC., BRIARCLIFF NURSING	)	
HOME, INC., SPRING CREEK OF IHS, INC.,	)	
FIRELANDS OF IHS, INC., ELM CREEK OF	)	
IHS, INC., and IHS LONG TERM CARE	)	
SERVICES, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
THCI COMPANY LLC,	)	
	)	
Defendant,	)	
	)	
v.	)	
	)	
ABE BRIARWOOD CORPORATION and	)	
JOHN DOES 1-10,	)	
	)	
Additional Counterclaim	)	
Defendants,	)	
	)	

**DECLARATION OF ISIDORE ZIMMERMAN**

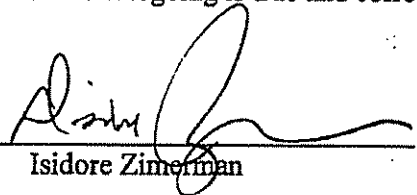
**ISIDORE ZIMMERMAN** declares:

1. I am Managing Clerk of Troutman Sanders LLP. Persons seeking to serve papers upon this Firm are generally directed to me.
2. On or about December 27, 2005, someone came to this Firm to serve papers, and was directed to me. I was handed the papers, and saw that it was a subpoena addressed to Leonard Grunstein, Esq., a Member of this Firm. I advised the process server, in

accordance with my standing instructions, that I can accept papers only on behalf of the Firm, in actions where it is the attorney for a party, and that I was not authorized to accept a subpoena on behalf of Mr. Grunstein. The process server answered, "That's all right", or something to that effect, and left, leaving the subpoena behind.

3. I understand the process server submitted a Declaration of Service claiming I told him not only that I was authorized to accept on behalf of Mr. Grunstein (I never said that, and indeed told him the opposite), but that I stated I was authorized to accept all corporation papers too. The utter falsity of his statement is proved by that last assertion. There was no corporation being served, and we obviously never had any conversation whatsoever about whether I was authorized to accept service on behalf of a corporation.

4. I declare, under penalty of perjury, that the foregoing is true and correct.  
Executed on March 10, 2006.

  
Isidore Zimmerman